ENVIRONMENTAL PROTECTION AGENCY

[FRL]

Applicability Determination Index (ADI) Data System Recent Posting: Agency Applicability Determinations, Alternative Monitoring Decisions, and Regulatory Interpretations Pertaining to Standards of Performance for New Stationary Sources, Emission Guidelines and Federal Plan Requirements for Existing Sources, National Emission Standards for Hazardous Air Pollutants, and the Stratospheric Ozone Protection Program.

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice of Availability.

SUMMARY: This notice announces applicability determinations, alternative monitoring decisions, and regulatory interpretations that EPA has made with regard to the New Source Performance Standards (NSPS); the National Emission Standards for Hazardous Air Pollutants (NESHAP); the Emission Guidelines and Federal Plan Requirements for existing sources; and/or the Stratospheric Ozone Protection Program.

FOR FURTHER INFORMATION CONTACT: An electronic copy of each complete document posted on the Applicability Determination Index (ADI) data system is available on the Internet through the Resources and Guidance Documents for Compliance Assistance page of the Clean Air Act Compliance Monitoring Web site under "Air" at: [HYPERLINK "https://www2.epa.gov/compliance/resources-and-guidance-documents-compliance-assistance"]. The letters and memoranda on the ADI may be located by author, date, office of issuance, subpart, citation, control number, or by string word searches. For questions about the ADI or this notice, contact Maria Malave at EPA by phone at: (202) 564-7027, or by email at: malave.maria@epa.gov. For technical questions about individual applicability determinations or

monitoring decisions, refer to the contact person identified in the individual documents, or in the absence of a contact person, refer to the author of the document.

SUPPLEMENTARY INFORMATION:

Background:

The General Provisions of the NSPS in 40 Code of Federal Regulations (CFR) part 60 and the General Provisions of the NESHAP in 40 CFR part 61 provide that a source owner or operator may request a determination of whether certain intended actions constitute the commencement of construction, reconstruction, or modification. 40 CFR 60.5 and 61.06. The General Provisions in part 60 also apply to Federal and EPA-approved state plans for existing sources in 40 CFR part 62. See 40 CFR 62.02(b)(2). The EPA's written responses to inquiries on provisions in parts 60, 61 and 62 are commonly referred to as applicability determinations. Although the NESHAP part 63 regulations [which include Maximum Achievable Control Technology (MACT) standards and/or Generally Available Control Technology (GACT) standards] contain no specific regulatory provision providing that sources may request applicability determinations, the EPA also responds to written inquiries regarding applicability for the part 63 regulations. In addition, the General Provisions in part 60 and 63 allow sources to seek permission to use monitoring or recordkeeping that is different from the promulgated requirements. See 40 CFR 60.13(i), 61.14(g), 63.8(b)(1), 63.8(f), and 63.10(f). The EPA's written responses to these inquiries are commonly referred to as alternative monitoring decisions. Furthermore, the EPA responds to written inquiries about the broad range of regulatory requirements in 40 CFR parts 60 through 63 as they pertain to a whole source category. These inquiries may pertain, for example, to the type of sources to which the regulation applies, or to the testing, monitoring, recordkeeping, or reporting requirements contained in the regulation.

The EPA's written responses to these inquiries are commonly referred to as regulatory interpretations.

The EPA currently compiles EPA-issued NSPS and NESHAP applicability determinations, alternative monitoring decisions, and regulatory interpretations, and posts them to the ADI on a regular basis. In addition, the ADI contains EPA-issued responses to requests pursuant to the stratospheric ozone regulations, contained in 40 CFR part 82. The ADI is a data system on the Internet with over three thousand EPA letters and memoranda pertaining to the applicability, monitoring, recordkeeping, and reporting requirements of the NSPS, NESHAP, emission guidelines and Federal Plans for existing sources, and stratospheric ozone regulations. Users can search for letters and memoranda by date, office of issuance, subpart, citation, control number, or by string word searches.

Today's notice comprises a summary of 48 such documents added to the ADI on **<TBD>**. This notice lists the subject and header of each letter and memorandum, as well as a brief abstract of the letter or memorandum. Complete copies of these documents may be obtained from the ADI on the Internet through the Resources and Guidance Documents for Compliance Assistance page of the Clean Air Act Compliance Monitoring Web site under "Air" at: [HYPERLINK "https://www2.epa.gov/compliance/resources-and-guidance-documents-compliance-assistance"].

Summary of Headers and Abstracts:

The following table identifies the database control number for each document posted on the ADI data system on **<TBD>**; the applicable category; the section(s) and/or subpart(s) of 40 CFR part 60, 61, 62, or 63 (as applicable) addressed in the document; and the title of the document, which provides a brief description of the subject matter.

Also included is an abstract of each document identified with its control number after the table. These abstracts are provided solely to alert the public to possible items of interest and are not intended as substitutes for the contents of the documents. This notice does not change the status of any document with respect to whether it is "of nationwide scope or effect" for purposes of CAA section 307(b)(1). For example, this notice does not convert an applicability determination for a particular source into a nationwide rule. Neither does it purport to make a previously non-binding document binding.

ADI Determinations Uploaded on <TBD>			
Control Number	**Categories**	**Subparts**	**Title**
1500085	NSPS	Ec	Applicability Determination for Hospital/Medical/Infectious Waste Incinerator
1800013	MACT, NSPS	BBBBBB, Kb, WW	Alternative Monitoring Plan for Internal Floating Roof Storage Tanks
1700037	NSPS	A	Regulatory Interpretation for Continuous Monitoring System Downtime and Emission Reporting
1700038	NSPS	Ja	Alternative Monitoring Plan for CEMS Calibration Gas at a Refinery

1700039	NSPS	J	Alternative Monitoring Plan for Sulfur Loading Arm Vent Streams at a Refinery
1700040	NSPS	Ja	Alternative Monitoring Plan for Total Sulfur Monitor on Flare at Refinery
1700041	NSPS	Ja	Monitoring Exemption for Hydrogen Sulfide at a Refinery
1700042	NSPS	Ja	Alternative Monitoring Plan for Sulfur Loading Arm Vent Streams at a Refinery
1700043	NSPS	Ce, Ec	Applicability Determination for HMIWI Pyrolysis Unit
1700044	NSPS	NNN, RRR	Alternative Monitoring Request for Distillation Units
1700045	NSPS	NNN, RRR	Performance Test Waiver and Alternative Monitoring Plan for Vent Gas Streams at Synthetic Organic Chemical Manufacturing Facility
1700046	NSPS	Y	Applicability Determination for Coal Storage and Transport Operation
1700047	NSPS	NNN, RRR	Alternative Monitoring Plan for Vent Streams at Synthetic Organic Chemical Manufacturing Facility

1700048	NSPS	Ja	Monitoring Exemption for Hydrogen Sulfide in Fuel Gas Streams at Refinery
1700049	NSPS	Ja	Monitoring Exemption for Hydrogen Sulfide in Fuel Gas Streams at Refinery
M170015	MACT	R	Alternative Monitoring Plan for Vapor Combustion Unit at Gasoline Distribution Terminal
M170016	MACT	F	Alternative Monitoring Plan for Heat Exchange System at Synthetic Organic Chemical Manufacturing Facility
M170018	MACT, NESHAP	DDDDD, JJJJJJ	Applicability Determination for Institutional Boilers
FP00001	Federal Plan	III	Alternative Monitoring Request for Kilns at a Cement Plant
1700050	NSPS	OOO	Waiver of Opacity Observation and Alternative Compliance Measure at Non-Metallic Mineral Processing Plant
M170019	MACT	ZZZZ	Clarification of Emergency and Non-Emergency Generator Use under NESHAP Subpart ZZZZ
FP00002	Federal Plan, NSPS	LLL	Determination for Specific Operating Parameters, Operating Limits, and

			Averaging Periods for Sewage Sludge Incinerator Control Device
FP00006	Federal Plan	LLL	Alternative Monitoring Method for Water Flow of Wet Electrostatic Precipitator and Reduced Frequency of Performance Testing
M170021	MACT	HHHHH	Design Evaluation and Proposed Operating Parameters for Carbon Adsorption System at Coating Manufacturing Facility
M170022	MACT	JJJ, MMM	Alternative Monitoring for Pressure Relief Devices on Portable Containers
M170023	MACT	A, EEEEE	Alternative Monitoring for Continuous Emissions Monitoring System on Automated Shakeout Line at Iron Foundry
1700052	NSPS	LL	Performance Test Extension Request for Dry Crushing Operations at Mineral Processing Plant
M170024	MACT	HHHHH	Design Evaluation and Proposed Operating Parameters for Carbon Adsorption System at Coating Manufacturing Facility

1700053	MACT, NSPS	AAAA, WWW	Applicability Determination for Flare at a Municipal Solid Waste Landfill
1700054	NSPS	GG	Alternative Testing for Nitrogen Oxides at Stationary Gas Turbines
M170025	MACT	LL	Compliance Date Extension for Carbon Adsorber System on Pitch Storage Tank at Paste Production Plant
M170026	MACT, NESHAP	JJJJJJ	Performance Test Time Extension for Coal-Fired Boiler
M170027	MACT	OOO	Alternative Monitoring Plan for Water Scrubber at a Methylated Resin Process
1800001	NSPS	WWW	Alternative Tier 2 Calculation Methodology for Municipal Solid Waste Landfill
M180002	MACT, NESHAP, NSPS	X	Alternative Monitoring Plan for Reverberatory Furnace
WDS-149	NSPS, Woodstoves		Applicability Determination for Wood-Burning and Electric Sauna Stoves
WDS-150	NSPS, Woodstoves	QQQQ	Clarification on Test Method 28 WHH-PTS and Subpart QQQQ for Hydronic Boiler Certification Tests

M180004	MACT, NESHAP	LLLLL	Applicability Determination and Alternative Monitoring for Mist Eliminator for Asphalt Storage Tank
1800003	NSPS	CCCC	Applicability Determination for Micro-Auto Gasification System
1800005	NSPS	J, Ja	Alternative Monitoring Plan for Hydrogen Sulfide during Tank Degassing at Refineries
M180005	MACT	S	Alternative Monitoring Plan for Closed Vent Collection Systems at a Paper Mill
Z180001	NESHAP, NSPS	J, UUU	Alternative Monitoring Plan for Wet Gas Scrubber at a Refinery
Z180002	NESHAP, NSPS	J, UUU	Alternative Monitoring Plan for Wet Gas Scrubber at a Refinery
1800006	NSPS	A, Ja	Alternative Monitoring Request for Flares at a Refinery
1800007	NSPS	A, OOO	Test Waiver and Alternate Means of Compliance for Baghouses
1800008	MACT, NSPS	CC, Kb	Regulatory Interpretation for Recordkeeping at Storage Tanks

1800009	NSPS	A, Ja	Alternative Monitoring Plan for Hydrogen Sulfide from Flares at Refineries
1700009	NSPS	OOOO	Applicability Determination for Natural Gas Processing Plant

Abstracts:

Abstract for [1500085]: [HYPERLINK "adi-nsps-1500085.pdf" \h]

Q1: Does EPA determine that the exemption at 40 CFR 60.50c(f) for "any pyrolysis unit" applies to the CoronaLux system to be installed at the eCycling International, LLC facility located in Ulmer, South Carolina?

A1: No. The exemption at 40 CFR 60.50c(f) does not apply to the CoronaLux system because the definition of "pyrolysis" at 40 CFR 60.51c is the "endothermic gasification of hospital waste..." and the CoronaLux system is not endothermic throughout the system.

Q2: Does EPA determine that the CoronaLux system would be subject to 40 CFR part 60 subpart Ec (hospital/medical/infectious waste incinerator (HMIWI) standards)?

A2: Yes. The CoronaLux system is a HMIWI because the operation of the primary chamber conforms to the definition of "primary chamber" in the HMIWI rule; in which the chamber receives waste material, in which waste is ignited, and from which it is removed. The low energy plasma chamber and the residence chamber are "secondary chambers" under the rule because they receive combustion gases from the primary chamber and the combustion process is completed.

Abstract for [1800013]: [HYPERLINK "adi-nsps-1800013.pdf" \h]

Q: Does EPA approve an Alternative Monitoring Plan (AMP) request for two internal floating roof (IFR) storage tanks located at the Phillips 66 East Saint Louis, Illinois facility (Phillips 66) and subject to 40 CFR part 60 subpart Kb?

A: Yes. EPA approves an AMP that allows Phillips 66 to conduct inspections of the IFR tank using a top-side in-service internal inspection methodology.

Abstract for [1700037]: [HYPERLINK "adi-nsps-1700037.pdf" \h]

Q1: Does EPA agree with the Oklahoma Department of Environmental Quality's (ODEQ) interpretation for reporting of Continuous Monitoring System (CMS) downtime, and the methodology for calculating emissions based upon a valid hour of data collected?

A1: Yes. EPA agrees with ODEQ on how CMS downtime and CMS reported emissions should be determined and reported.

Q2: What interpretation for reporting of CMS downtime did EPA concur with ODEQ?

A2: EPA agreed that each facility should record and report each period of CMS monitor downtime regardless of duration. EPA also clarified the intent of 40 CFR 60.7(d). Since minutes are used to assess opacity compliance, minutes must also be the unit of measure in determining downtime percentages of total operating time. Emission limitations other than opacity are typically based upon hourly block or rolling averages, so assessment of compliance and determining downtime percentages of total operating time needs to be on the same basis (i.e., hourly).

Q3: What interpretation for calculating CMS downtime did EPA concur with ODEQ?

A3: EPA agreed that the calculation of the hourly average emissions requires using each valid 1-minute reading within an hourly monitoring time, not four 15-minute averages within each hour. In accordance with 40 CFR 60.13(h)(2)(v), all valid data points within the monitoring period must be used.

Abstract for [1700038]: [HYPERLINK "adi-nsps-1700038.pdf" \h]

Q: Does EPA conditionally approve a request to reduce the concentrations of the calibration gas and validation standards on the continuous emission monitoring system (CEMS) for several flares subject to NSPS subpart Ja at the Valero St. Charles refinery located in Norco, Louisiana?

A: Yes. EPA conditionally approves the request provided that all other requirements of the monitoring procedures of NSPS Subpart Ja for total reduced sulfur (TRS) are followed. The alternative span gases will address safety concerns involving storage, handling, and engineering controls. EPA conditionally approved Valero's proposed calibration gas concentration ranges for conducting daily drift checks, relative accuracy test audits, and cylinder gas audits, using total sulfur ovens to continuously analyze and monitor TRS. Additionally, Valero must conduct linearity analysis on the total sulfur ovens once every three years to determine linearity across the entire range of expected concentrations of acid gas vent streams.

Abstract for [1700039]: [HYPERLINK "adi-nsps-1700039.pdf" \h]

Q1: Does EPA approve an Alternative Monitoring Plan to allow sulfur loading arm vent streams from sulfur recovery units (SRUs) to be combusted in the respective Tail Gas Incinerators (TGIs) under NSPS subpart J at the Valero Houston Refinery located in Houston, Texas?

A1: Yes. Both SRUs are affected facilities under NSPS subpart J, and the TGIs have continuous emission monitors which comply with the applicable sulfur dioxide emission limit of 250 parts per million (ppm).

Q2: What was the rationale for EPA's approval?

A2: The sulfur loading arm vent streams include small amounts of hydrogen sulfide vapor at low pressure. These streams are similar to sulfur pit vapors that are routed to the TGIs.

EPA has previously determined that such vapors may be controlled by TGIs because sulfur pits are considered to be part of an SRU.

Abstract for [1700040]: [HYPERLINK "adi-nsps-1700040.pdf" \h]

Q: Does EPA approve a modification to the July 21, 2016 prior approval of an Alternative Monitoring Plan (AMP) to use the data obtained from the total sulfur (TS) continuous emissions monitoring system (CEMS) for a flare at Plant 3 of the Suncor Energy (U.S.A.) Inc. (Suncor) Commerce City Refinery in Commerce City, Colorado subject to NSPS subpart Ja? Prior approval is at ADI #1600033.

A: Yes. EPA approves Suncor's AMP for a flare at Plant 3, pursuant to 40 CFR 60.13(i), to use the data obtained from the TS CEMS low range two-point daily calibration drift and two-point quarterly audits, as well as a one-point challenge in the high range. Because Suncor is requesting this AMP based on a significant safety hazard to refinery personnel and because this monitoring is being performed to detect the threshold for a root cause analysis, not to monitor for compliance with an emission limit, the EPA will allow for minimal use of high concentration calibration gases. This approach avoids routine use of higher level calibration gases in the field; higher level gases are only used for quarterly audits and annual testing and could be brought on-site by a testing contractor and then removed after the test/audit.

Abstract for [1700041]: [HYPERLINK "adi-nsps-1700041.pdf" \h]

Q: Does EPA approve an exemption in lieu of an Alternative Monitoring Plan for combusting an off-gas vent stream from a catalytic oxidizer unit as an inherently low-content sulfur stream under NSPS for Refineries part 60 subpart Ja at the Valero Refining – Texas L.P.'s (Valero's) refinery located in Texas City, Texas?

A: Yes. Based on the process operating parameters and monitoring data submitted by Valero, EPA conditionally approves the exemption request. EPA determines that the Valero

catalytic oxidizer unit vent stream is inherently low in sulfur according to 40 CFR 60.107a(a)(3)(iv). Therefore, the fuel gas combustion device does not need to meet the monitoring requirements of 40 CFR 60.107a(a)(1) or 60.107a(a)(2). [***Note: these last two citations are not included in the letter.] If the sulfur content or process operating parameters for the off-gas vent stream change from representations made for the exemption determination, the company must document the changes, re-evaluate the vent stream characteristics, and follow the appropriate steps outlined in 40 CFR 60.107a(b)(3). The exemption determination should also be referenced and attached to the facility's new source review and Title V permit for federal enforceability.

Commented [ARS1]: Citations were in abstract but not in letter.

Abstract for [1700042]: [HYPERLINK "adi-nsps-1700042.pdf" \h]

Q1: Does EPA approve an Alternative Monitoring Plan to allow sulfur loading arm vent streams from sulfur recovery plants (SRPs) to be combusted in the respective Tail Gas Incinerators (TGIs) under NSPS subpart J at the Valero Refining – Texas L.P.'s refinery located in Texas City, Texas?

A1: Yes. Both SRPs are affected facilities under NSPS Subpart J, and the TGIs have continuous emission monitors which comply with the applicable sulfur dioxide emission limit of 250 parts per million.

Q2: What was the rationale for EPA's approval?

A2: The sulfur loading arm vent streams include small amounts of hydrogen sulfide vapor at low pressure. These streams are similar to sulfur pit vapors that are routed to the TGIs. EPA has previously determined that such vapors may be controlled by TGIs because sulfur pits are considered to be part of an SRP.

Abstract for [1700043]: [HYPERLINK "adi-nsps-1700043.pdf" \h]

Q1: Does EPA determine that the Monarch Waste Technologies (MWT) Pyromed Pyrolysis System to be operated at the Nambe Pueblo as a hospital/medical/infectious waste incinerator (HMIWI) should be exempted as a pyrolysis unit from the emission standards and compliance requirements of NSPS part 60 subpart Ec?

A1: No. Based on EPA's review of the design and operation information MWT submitted, and review of historic supporting documents for rule promulgation, the Pyromed System would be subject to NSPS Ec. In the first part of the Pyromed system, gasification occurs, which generates a vent stream composed of steam and air. This is consistent with transformation that takes place in the primary chamber of an HMIWI, where organic components are volatilized, and nonvolatile materials converted to ash. In the second part of the system, MWT stated that the unit combusts the syngas vent stream. This is consistent with the combustion that takes place in the secondary chamber of an HMIWI. Even though MWT used different terminology to describe the design and operation of the Pyromed system, the end results were still consistent with the definitions of an HMIWI under NSPS Ec.

Q2: Why does the Pyromed Pyrolysis System not meet the criteria for exemption?

A2: There is an exception at 40 CFR 60.50c(f) for "any pyrolysis unit" as that term is defined in the rule. Because the Pyromed system is not endothermic throughout the overall operation, EPA does not believe the Pyromed System meets the definition of pyrolysis unit as defined in NSPS Ec.

Abstract for [1700044]: [HYPERLINK "adi-nsps-1700044.pdf" \h]

Q1: Does EPA approve the alternative monitoring request for the distillation units at the Albemarle Corporation Pasadena, Texas facility, which is covered under 40 CFR Part 60, NSPS for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical

Manufacturing Industry (SOCMI) Distillation Operations (Subpart NNN) and Reactor Processes (Subpart RRR)?

A1: Yes, EPA conditionally approved the request for meeting Subpart RRR requirements in lieu of those in Subpart NNN for testing, monitoring, and record-keeping, related specifically to the use of car seals on closed bypass valves in lieu of flow indicators for compliance with the standards of both Subparts. Subpart NNN requires flow indicators at each valve. Under Subpart RRR, in lieu of flow indicators each valve would be treated as a bypass line and must be secured with a car-seal or lock and key configuration. Each seal or closure mechanism must be visually inspected monthly and maintained in the closed position so that the vent stream is not diverted through the closed line.

Q2: What other additional requirements must be met?

A2: To ensure that vent streams are routed to appropriate control devices, Subpart RRR requires that the facility maintain a schematic diagram of the affected vent streams, collection system(s), fuel systems, control devices, and bypass systems, and include the diagram in the initial report submitted in accordance with 40 CFR §60.705(b). [***Note: 60.705(b) is cited in the abstract but not in the AD letter]

Commented [ARS2]: Citations were in abstract but not in letter.

Abstract for [1700045]: [HYPERLINK "adi-nsps-1700045.pdf" \h]

Q: Does EPA approve the Alternative Monitoring and Testing Waiver request for the vent gas streams from the Olefins Manufacturing Unit and Demethanizer Distillation Column Vents at the Eastman Chemical Company facility, located in Longview, Texas, which is covered under 40 CFR part 60, Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (subpart NNN) and Reactor Processes (subpart RRR)?

A: Yes. EPA approves the request for meeting subpart RRR in lieu of subpart NNN requirements for testing, monitoring, and recordkeeping for use of process boilers, furnaces and heaters as control devices for compliance with the standards of both subparts. The vent streams will be introduced with the primary fuel for each combustion device. None of the vents have bypasses directly to atmosphere. A copy of the schematic required by 40 CFR 60.705(s) is required with the initial report to the state agency and must be maintained on site for the life of the system to ensure that the affected vent streams are being routed to appropriate control devices without bypass.

Abstract for [1700046]: [HYPERLINK "adi-nsps-1700046.pdf" \h]

Q: Does EPA determine that the coal storage and transport operation located at the Kinder Morgan Hickman Bulk Terminal in Blytheville, Arkansas is an affected coal preparation plant subject to the requirements of NSPS subpart Y?

A: No. Based on Kinder Morgan's process description and review of support and guidance documents for subpart Y, the EPA determined that although the Hickman Bulk Terminal stores, loads, and transports more than 200 tons per day of pre-processed coal and coke, no additional processing of coal that involves breaking, crushing, cleaning, or drying takes place at the facility.

Abstract for [1700047]: [HYPERLINK "adi-nsps-1700047.pdf" \h]

Q: Does EPA approve the Alternative Monitoring request for the distillation unit at the Nova Molecular Technologies, Inc. Pasadena, Texas facility, which is covered under 40 CFR part 60, Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (subpart NNN) and Reactor Processes (subpart RRR)?

A: Yes. EPA approves the request for meeting subpart RRR requirements in lieu of those in subpart NNN for testing, monitoring, and record-keeping, related specifically to the use of car seals on closed bypass valves in lieu of flow indicators for compliance with the standards of both subparts. NSPS subpart NNN requires flow indicators at each valve. Under subpart RRR, in lieu of flow indicators each valve would be treated as a bypass line and must be secured with a car-seal or lock and key configuration. Each seal or closure mechanism must be visually inspected monthly and maintained in the closed position so that the vent stream is not diverted through the closed line.

Abstract for [1700048]: [HYPERLINK "adi-nsps-1700048.pdf" \h]

Q: Does EPA approve an exemption in lieu of an Alternative Monitoring Plan for combusting an off-gas vent stream from a lean amine tank as an inherently low-content sulfur stream under NSPS for Refineries part 60 subpart Ja at the Valero Refining-Texas L.P.'s (Valero's) refinery located in Texas City, Texas?

A: Yes. Based on the process operating parameters and monitoring data submitted by Valero, EPA conditionally approves the exemption request. EPA determines that Valero's lean amine tank vent stream is inherently low in sulfur according to 60.107a(a)(3)(iv). Therefore, the fuel gas combustion device does not need to meet the monitoring requirements of 60.107a(a)(1) or 60.107a(a)(2). [***Note: these last two citations are not included in the determination letter.] If the sulfur content or process operating parameters for the off-gas vent stream change from representations made for the exemption determination, the company must document the changes, re-evaluate the vent stream characteristics, and follow the appropriate steps outlined in 40 CFR 60.107a(b)(3). The exemption determination should also be referenced and attached to the facility's new source review and Title V permit for federal enforceability.

Commented [ARS3]: Citations were in abstract but not in letter.

Abstract for [1700049]: [HYPERLINK "adi-nsps-1700049.pdf" \h]

Q: Does EPA approve an exemption in lieu of an Alternative Monitoring Plan for combusting the combined off-gas vent stream from API separators and vacuum truck loading as an inherently low-content sulfur stream under NSPS for Refineries part 60 subpart Ja at the Valero Refining-Texas L.P.'s (Valero's) refinery located in Texas City, Texas?

A: Yes. Based on the process operating parameters and monitoring data submitted by Valero, EPA conditionally approves the exemption. EPA determines that the Valero Texas City API separator and vacuum truck loading combined vent stream is inherently low in sulfur according to 40 CFR 60.107a(a)(3)(iv). If the sulfur content or process operating parameters for the off-gas vent stream change from representations made for the exemption determination, the company must document the changes, re-evaluate the vent stream characteristics, and follow the appropriate steps outlined in 40 CFR 60.107a(b)(3). The exemption determination should also be referenced and attached to the facility's new source review and Title V permit for federal enforceability.

Abstract for [M170015]: [HYPERLINK "adi-mact-m170015.pdf" \h]

Q: Does EPA approve an Alternative Monitoring Plan (AMP) under MACT subpart R for monitoring of alternative operating parameters at a thermal oxidation system in lieu of temperature monitoring at the firebox during loading of gasoline cargo tanks at the Magellan Pipeline Company, LP's (Magellan's) bulk gasoline distribution terminal located in Enid, Oklahoma?

A: Yes. Based on the data provided, EPA approves the AMP. Magellan submitted results from a performance test conducted in accordance with 40 CFR 63.425(b), demonstrating overall compliance with the emission standard. Magellan proposed alternative monitoring of the presence of a pilot flame, operation of the assist-air blower, and operation of the vapor line valve

for the thermal oxidation system. Additionally, Magellan proposed monthly and semi-annual inspections to ensure efficient operation of the associated monitoring equipment.

Abstract for [M170016]: [HYPERLINK "adi-mact-m170016.pdf" \h]

Q: Does EPA approve an alternative monitoring plan to use a sampling technique which is different from that specified under 40 CFR part 63 subpart F for the heat exchange system at the Rubicon LLC facility located in Geismar, Louisiana?

A: No. EPA denied the request based on lack of sufficient justification for using the alternate sampling method. Based on the limited information presented, EPA determined that the company failed to sufficiently demonstrate that composite sample collection would achieve an equivalent level of monitoring as three sets of grab samples taken at the entrance and exit of the heat exchange system, as required by 40 CFR 63.104(b)(5).

Abstract for [M170018]: [HYPERLINK "adi-mact-m170018.pdf" \h]

Commented [ARS4]: Given January policy changes on once-in/always in, does HQ want to publish this AD on ADI?

Q1: When James Madison University (JMU) in Harrisonburg, VA removed equipment on April 8, 2015 lowering it's potential to emit, is the source then considered an area source on that day or does it remain a major source until it is issued a new permit?

A1: A letter issued by the Virginia Department of Environmental Quality on April 9, 2015 affirmed that the equipment was permanently decommissioned and that the equipment was removed from their air emissions inventory. This confirms that the potential to emit dropped below the 10 ton per year threshold to be considered a major source. The facility therefore became an area source on the day the equipment was removed; April 8, 2015.

Q2: Are new boilers, installed in 2011, subject to 40 CFR part 63 subpart DDDDD (boilers at major sources)?

A1: At the time of installation in 2011, the facility was considered a major source. As specified in subpart DDDDD, the compliance date for new boilers at major sources was April 1,

2013 or upon startup. JMU became an area source on April 8, 2015; after the compliance date. Therefore, the "once in always in" rule applies and these boilers are still subject to the major source requirements of subpart DDDDD.

Q3: Are existing boilers, installed between 1992 and 1997, subject to 40 CFR part 63 subpart DDDDD (boilers at major sources)?

A3: At the time of installation in the 1990's, the source was considered a major source and subject to subpart DDDDD. The compliance date for existing boilers was January 31, 2016. Because the facility became an area source (on April 8, 2015) prior to the compliance date, the "once in always in" rule does not apply. Therefore, these boilers are subject to the area source standards of 40 CFR part 63 subpart JJJJJJ.

Q4: How does the transition from a major source to an area source affect initial notification requirements of subparts JJJJJJ and DDDDD? How does this affect previously submitted reports?

A4: Notifications and reports must be submitted as specified in the applicable section of the CFR.

Abstract for [FP00001]: [HYPERLINK "adi-nsps-fp00001.pdf" \h]

Q: Does EPA approve Lafarge Midwest, Inc.'s (Lafarge's) request to use a hydrogen chloride continuous emission monitoring system (HCl CEMS) on each of five kilns that are subject to the Federal Plan Requirements for Commercial and Industrial Solid Waste Incineration Units (CISWI FIP) at its cement plant located in Alpena, Michigan?

A: Yes. The proposed CISWI FIP currently provides for the option requested by Lafarge under 40 CFR 62.14690(g). This subsection authorizes the substitution of HCl CEMS for conducting the HCl annual performance test, monitoring the minimum HCl sorbent flow rate and monitoring the minimum scrubber liquor pH.

Abstract for [1700050]: [HYPERLINK "adi-nsps-1700050.pdf" \h]

Q1: Does EPA approve United Taconite LLC (United) to use daily visible emission checks instead of a Method 9 opacity observation test for the intermittent, backup winter fluxstone unloading fugitive source, regulated by 40 CFR part 60 subpart OOO, at its fluxstone handling facility in Forbes, Minnesota?

A1: No. EPA denies United's request to waive Method 9 testing on the winter fluxstone unloading facilities. United must comply with the requirements of subpart OOO by conducting the required testing.

Q2: Does EPA waive the requirement for Method 9 visible emission performance testing requirements for affected facilities inside United's fluxstone storage building?

A2: No. EPA denies United's request to waive Method 9 testing on the fluxstone storage building. United must comply with the requirements of subpart OOO by conducting the required testing.

Q3: Does EPA determine that United meets the testing requirements for its EQUI 173 and 174 emission units with a single test using the stack from the common control device?

A3: Yes. EPA approves United's request to meet the testing requirements on summer unloading conveyors by conducting a combined emission test.

Q4: Does EPA determine that the appropriate limit for the fabric filter control device controlling EQUI 173 and 174 is 0.014 grains per dry standard cubic foot (gr/dscf)?

A4: Yes. EPA approves United's request to comply with an emission limit of 0.014 gr/dcsf on the combined operations of both summer unloading conveyors and to demonstrate compliance at the fabric filter control device.

Q5: Does EPA determine that a compliant performance test of EQUI 173 and 174 is sufficient evidence to grant a testing requirement waiver for the EQUI 175 facility?

A5: Yes. EPA conditionally approves United's request to waive the testing requirement of an initial performance test at the fabric filter controlling the winter fluxstone unloading conveyor. United must first demonstrate the compliance of the fabric filter during the combined testing of the summer unloading conveyors before EPA will waive the initial testing requirement.

Abstract for [M170019]: [HYPERLINK "adi-mact-m170019.pdf" \h]

Q: Does EPA determine that additional time needed for the Roche Diagnostic Operations, Inc. (Roche) facility, located in Indianapolis, Indiana, to switch from the facility's emergency generators back to utility-provided power after a power outage has ended should be considered operation in an "emergency situation" under 40 CFR part 63 subpart ZZZZ?

A: No. Operation of the engines as a result of a power outage is operation in an emergency situation until the first available opportunity to be switched back to the utility-provided power. Generally, any period of operation that occurs after Roche could have switched back to utility power but chose not to do so for operational convenience should not be considered operation in an emergency situation.

Abstract for [FP00002]: [HYPERLINK "adi-nsps-fp00002.pdf" \h]

Q: Does EPA approve Ypsilanti Community Utilities Authority's (YCUA) request for specific operating parameters, operating limits, and averaging periods for an existing fluidized bed sewage sludge incinerator control device other than a wet scrubber, fabric filter, electrostatic precipitator, activated carbon injection, or afterburner used to comply with the emission limits in 40 CFR 62.15965 at its facility in Ypsilanti, Michigan?

A: Yes. YCUA provided all the necessary information required under 40 CFR 62.15965. This determination authorizes YCUA to use the specified request for specific operating parameters, operating limits, and averaging periods for their existing fluidized bed sewage sludge incinerator control device.

Abstract for [FP00006]: [HYPERLINK "adi-nsps-fp00006.pdf" \h]

Q: Does EPA approve Metropolitan Council - Environmental Services (MCES) Division's request for an alternative monitoring method regarding water flow of the wet electrostatic precipitator (ESP) at both the Metropolitan Wastewater Treatment Plant (Metro Plant) and Seneca Wastewater Treatment Plant (Seneca Plant) and reduced frequency of performance testing at the Seneca Plant?

A: Yes. EPA approves the alternative monitoring method. MCES demonstrated their alternative monitoring method was accurate, and EPA has approved similar types of inlet flow monitoring for ESPs used at sewage sludge incinerators. EPA also approves the request for reduced frequency of performance testing because of the unique operating schedule of its multiple hearth incinerators.

Abstract for [M170021]: [HYPERLINK "adi-mact-m170021.pdf" \h]

Q1: Does EPA approve Dow Chemical Company's (Dow's) proposal to use a carbon adsorption system to control emissions under 40 CFR part 63 subpart HHHHH from the Structural Adhesives Process Unit at its miscellaneous coating manufacturing facility in Midland, Michigan?

A1: No. Dow did not submit sufficient information for EPA to evaluate the proposal to use a carbon adsorption system.

Q2: Does EPA approve Dow's proposed operating parameter for the carbon adsorption system?

A2: No. Dow's proposed operating parameter is insufficient to ensure that the carbon bed is operating properly at all times.

Abstract for [M170022]: [HYPERLINK "adi-mact-m170022.pdf" \h]

Q: Does EPA approve at Dow Chemical Company's Midland, Michigan facility the use of alternative monitoring of pressure relief devices for portable containers per 40 CFR part 63 subparts JJJ and MMM?

A: Yes. EPA approves alternative monitoring for pressure relief devices associated with portable containers with the following requirements: (i) visually observe each portable container during the initial start of the loading operation and periodically during the transfer; (ii) document the required recordkeeping per the respective standard; (iii) complete weekly RCRA hazardous waste container inspections when stored at the generating facility; (iv) recordkeeping for the weekly inspections as required by the RCRA and CAA standards; (v) daily RCRA hazardous waste container inspection when stored at on-site RCRA permitted treatment, storage, disposal facility; (vi) recordkeeping of daily RCRA hazardous waste container inspections as required by RCRA; and (vii) comply with Level 1 or 2 of control requirements as applicable.

Abstract for [M170023]: [HYPERLINK "adi-mact-m170023.pdf" \h]

Q: Does EPA approve Brembo North America, Inc.'s (Brembo's) request to use a Continuous Parametric Monitoring System in lieu of a continuous emissions monitoring system (CEMS) for monitoring Volatile Organic Hazardous Air Pollutant (VOHAP) emissions under 40 CFR part 63 subpart EEEEE from an automated castings shakeout line at its grey iron foundry in Homer, Michigan?

A: No. Brembo has not provided sufficient information to demonstrate that operating a VOHAP CEMS device on its shakeout line would be technically infeasible or impractical.

Abstract for [1700052]: [HYPERLINK "adi-nsps-1700052.pdf" \h]

Q: Does EPA approve Magnetation LLC's request for a performance test deadline extension for dry crushing operations at its Plant 2 facility subject to NSPS subpart LL and

located in Grand Rapids, Minnesota due to the fact that the dry crushing equipment was removed from the site prior to the performance test deadline?

A: No. EPA denies the request for a performance test extension. However, since the dry crushing operations are no longer present at the facility, the requirement to conduct a performance test is no longer applicable. Any new dry crushing equipment will be subject to all applicable permit requirements, NSPS subpart LL, and the performance testing requirements of 40 CFR 60.8.

Abstract for [M170024]: [HYPERLINK "adi-mact-m170024.pdf" \h]

Q1: Does EPA approve The Dow Chemical Company's (Dow's) proposal to discontinue use of the Impinging Liquid Adsorption System and instead use a carbon adsorption system under 40 CFR part 63 subpart HHHHH at its miscellaneous coating manufacturing facility in Midland, Michigan?

A1: No. Dow did not submit sufficient information for EPA to evaluate the proposal to use a carbon adsorption system.

Q2: Does EPA approve Dow's proposed operating parameter for the carbon adsorption system?

A2: No. Dow's proposed operating parameter is insufficient to ensure that the carbon bed is operating properly at all times.

Abstract for [1700053]: [HYPERLINK "adi-nsps-1700053.pdf" \h]

Q: Does EPA determine that a flare controlling the purge gas stream of a landfill gas treatment system siloxane removal process at the Liberty Landfill, Inc. landfill located in Monticello, Indiana is subject to the control requirements of 40 CFR 60.752(b)(2)(iii)(A) or (B) under NSPS subpart WWW?

A: Yes. EPA determines that the purge gas stream constitutes an "atmospheric vent from the gas treatment system" and is therefore subject to the control requirements of 40 CFR 60.752(b)(2)(iii)(A) or (B).

Abstract for [1700054]: [HYPERLINK "adi-nsps-1700054.pdf" \h]

Q: Does EPA approve Halcón Resources' request for nitrogen oxides (NOx) performance testing on turbines subject to NSPS subpart GG at three locations on the Fort Berthold Indian Reservation in Dunn County, North Dakota to be allowed to test at 2 loads instead of 4 loads?

A: Yes. EPA approves the alternative testing request for the performance testing for NOX required under 40 CFR 60.335. The required tests may be conducted at an initial maximum load and a second load 15-25% lower than maximum load of each turbine for 42-minute test run times, double the required 21-minute test run time outlined in Method 20, section 8.5. Pursuant to 40 CFR 60.8(b)(4), EPA waives the requirement under 40 CFR 60.335(b)(2) for Halcón Resources to conduct the four evenly-spaced point load test for NOX emissions for gas turbines at the San Luis/Alamosito Pad, Sherman Pad and Yale Pad facilities contingent upon doubling the run times of each of the three tests.

Abstract for [M170025]: [HYPERLINK "adi-mact-m170025.pdf" \h]

Q: Alcoa Warrick LLC (Alcoa) is in the process of restarting a smelter idled on March 31, 2016, and is requesting additional time under 40 CFR subpart LL for the installation of a carbon adsorber system necessary to meet the required POM removal rate at the pitch tank(s) located in the paste production plant in Newburgh, Indiana. Does EPA grant Alcoa's request for an additional 60 days to the October 16, 2017 compliance date contained in 40 CFR 63.847(a)(2)(iii) for the pitch storage tank POM limit provisions of 40 CFR 63.843(d)?

A: Yes. Since the additional 60 days is "necessary for the installation of controls," EPA grants the limited extension in accordance with 40 CFR 63.6(i)(4)(i)(A).

Abstract for [M170026]: [HYPERLINK "adi-mact-m170026.pdf" \h]

Q: Does EPA approve Associated Milk Producers, Inc.'s request for a performance test time extension under 40 CFR part 63 subpart JJJJJJ, so that the facility, located in Jim Falls, Wisconsin, can perform the test concurrent with another state-required test to minimize the cost of testing?

A: No. The request involves a coal-fired boiler, and the test is required to demonstrate compliance pursuant to NESHAP subpart JJJJJJ. Based on the information provided, there are no grounds for an extension under NESHAP subpart JJJJJJ or 40 CFR 63.7 (Performance Testing Requirements).

Abstract for [M170027]: [HYPERLINK "adi-mact-m170027.pdf" \h]

Q: Does EPA approve Allnex USA Inc.'s (Allnex's) request to not monitor the pH of a water scrubber for a methylated resin process subject to 40 CFR part 63 subpart OOO at its Kalamazoo, Michigan facility?

A: Yes. The regulation at 40 CFR 63.1415(c)(2) states that an owner or operator who uses one of the control devices included in 40 CFR 63.1415(b) (e.g., a scrubber) may request approval to monitor parameters other than those specified in Table 3 of Subpart OOO. Since methanol and formaldehyde are not acidic gases, are both highly soluble in water, and the scrubber is a once-through system, the pH of the scrubber effluent does not affect the scrubber's removal efficiency; therefore, EPA approves Allnex's request to forego monitoring of the pH of the scrubber effluent.

Abstract for [1800001]: [HYPERLINK "adi-nsps-1800001.pdf" \h]

Q1: Does EPA approve additional Tier 2 testing in the intervening months between when the landfill gas collection and control system (GCCS) Design Plan is due and when the GCCS is required to be operational at the Central Sanitary Landfill (CSL) located in Pierson, Michigan and subject to 40 CFR part 60 subpart WWW?

A1: Yes. Many previous determinations issued by EPA have allowed additional Tier 2 testing to be conducted in this interim period.

Q2: Does EPA approve CSL to use actual flowrate data measured from the header of its voluntary GCCS and the equation set forth in 40 CFR 60.754(b) in lieu of the procedure at 40 CFR 60.754(a)(1) so long as it can fully account for the total quantity of landfill gas being generated by the landfill?

A2: Yes. On the condition that CSL can demonstrate that it is collecting for the total quantity of landfill gas being generated by the landfill to the satisfaction of the Michigan Department of Environmental Quality.

Abstract for [M180002]: [HYPERLINK "adi-mact-m180002.pdf" \h]

Q: Does EPA approve Quemetco Inc.'s request to use reverberatory furnace firing rate as a surrogate for temperature to demonstrate compliance with the emission standards for total hydrocarbon (THC) and dioxins and furans (D/F) emissions standards at its Indianapolis, Indiana facility subject to 40 CFR part 63 subpart X?

A: No. The emission standards for THC and D/F apply at Quemetco's one reverberatory furnace and at one electric furnace. The proposed alternative monitoring plan (AMP) would use reverberatory furnace firing rate to demonstrate compliance for all furnace operating scenarios. As one operating scenario is the use of only the electric furnace, the proposed AMP would not allow for the demonstration of compliance for all furnace operating scenarios.

Abstract for [WDS-149]: [HYPERLINK "adi-woodstoves-wds-149.pdf" \h]

Q: Does the EPA determine that the 2015 Wood Heater regulations (2015 Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces (subpart AAA)) apply to the manufacture of Kuuma sauna stoves by Lamppa Manufacturing Inc. (Lamppa) located in Tower, Minnesota?

A: No. After review of the information provided, including the specific details concerning their design as well as the intended use when properly built and installed, EPA has determined that subpart AAA does not apply to Lamppa's sauna stoves. According to your information, the sauna stoves as manufactured are intended solely for the purpose of heating a "sauna hot-room" and are not meant to be a heat source for any other area, including residential space ("homes or living quarters"). Subpart AAA defines a wood heater as "an enclosed, wood burning-appliance capable of and intended for residential space heating or space heating and domestic water heating." For subpart AAA to be applicable, the wood heater would have to be meant for residential purposes. The term "residential" is commonly defined as a space designed and used for people to live in. Therefore, since the Kuuma sauna stoves are intended to heat the sauna hot-room only and not to be used for residential use, EPA has determined that subpart AAA does not apply to the Kuuma sauna stoves.

Abstract for [WDS-150]: [HYPERLINK "adi-woodstoves-wds-150.pdf" \h]

Q: The RISE Research Institutes of Sweden AB is conducting certification tests for a hydronic boiler. If RISE Research Institutes of Sweden AB uses Method 28 WHH-PTS when conducting certification tests for a hydronic boiler, does EPA determine that the method's startup phase measurement satisfies the first hour particulate matter (PM) emissions measurement as required by the 2015 Wood Heater Rule (the Rule), subpart QQQQ, at 40 CFR 60.5476(c)(6))?

A: Yes. EPA determines that the Method 28 WHH-PTS startup phase measurement does meet the regulatory first-hour measurement requirement. The intent of the Rule to measure

potentially higher emissions associated with startup conditions is obtained by the test method which separately captures the emissions from the explicitly defined startup phase. Test Method 28 WHH-PTS not only measures PM emissions for the entire test duration, including the startup phase, the Method also clearly defines the startup phase "as the period from the start of the test until 15 percent of the test fuel charge is consumed." As a result of the specificity of the test method in providing a discrete definition for the startup phase and instructing that a separate measurement for emissions during that phase be taken, the agency concludes the test method is satisfying the regulatory requirement to measure PM emissions associated with startup conditions.

Abstract for [M180004]: [HYPERLINK "adi-mact-m180004.pdf" \h]

Q1: Does EPA determine that a mist eliminator controlling emissions from only a Group 2 tank needs to comply with item 3 or 4 of Table 5 of the NESHAP subpart LLLLL at the CertainTeed Corporation facility located in Shakopee, Minnesota?

A1: Yes. A mist eliminator needs to comply with item 4 of Table 5 of the NESHAP subpart LLLLL because a mist eliminator is not a combustion device.

Q2: Does EPA approve of monitoring the mist eliminator to ensure a minimum pressure drop is met and performing daily visible emission checks to demonstrate compliance with the opacity standard?

A2: No. The mist eliminator must be monitored to ensure a pressure drop is maintained between a range and that the gas inlet temperature is maintained below a certain temperature established by the most recent stack test or according to the manufacturer's specifications.

Abstract for [1800003]: [HYPERLINK "adi-nsps-1800003.pdf" \h]

Q: Does EPA determine that Dyno Nobel Inc.'s Micro-Auto Gasification System ("MAGS") located at its Wolf Lake, Illinois facility is subject to the Standards of Performance for Commercial and Industrial Solid Waste Incineration Units (NSPS subpart CCCC)?

A: No. EPA concludes that the MAGS unit does not combust solid waste as defined in 40 CFR part 241. Therefore, the MAGS unit is not subject to NSPS subpart CCCC.

Abstract for [1800005]: [HYPERLINK "adi-nsps-1800005.pdf" \h]

Q1: Does EPA approve an Alternative Monitoring Plan (AMP) for O-Zone Industrial Services to conduct monitoring of hydrogen sulfide (H2S) emissions, in lieu of installing a continuous emission monitoring system, when performing tank degassing and other similar operations controlled by portable, temporary thermal oxidizers, at refineries that are subject to NSPS subparts J or Ja?

A1: Yes. Based on the description of the process, the vent gas streams, the design of the vent gas controls, and the H2S monitoring data furnished, EPA conditionally approves the AMP. EPA is including proposed operating parameter limits and data which the refineries must furnish as part of the conditional approval.

Q2: Is the approved AMP specific for refineries in a single EPA Region only?

A2: Yes. The approved AMP is only for degassing operations conducted at refineries in EPA Region 6. Separate, similar AMP requests for the same company to conduct degassing operations at refineries in states in other EPA regions must be approved by those EPA regions.

Abstract for [M180005]: [HYPERLINK "adi-mact-m180005.pdf" \h]

Q: Does EPA conditionally approve an Alternative Monitoring Plan (AMP) to change the fixed 30-day frequency for inspections required for closed-vent collection systems, subject to 40 CFR part 63 subpart S, at the Clearwater Paper Corporation (Clearwater) Cypress Bend Mill in McGehee, AR?

A: Yes. EPA conditionally approves Clearwater's request to conduct inspections on a monthly basis rather than every thirty days. EPA accepts the proposed submittal of a site-specific Leak Detection and Repair (LDAR) plan, but does not approve the safety height threshold of four feet, referencing the requirement at 40 CFR 63.148(h)(1), in which the safety height threshold is specified as 2 meters (approximately 6 feet). EPA also conditionally approves alternative monitoring provisions for inherently unsafe or inaccessible equipment, requiring that such equipment be specifically identified, and that the alternative monitoring LDAR plan describe how the equipment will be inspected and/or repaired during safe-to-inspect periods, in accordance with 40 CFR 63.148(i)(1) and (2). The written plan must require inspections to be conducted at least once during each term, or more frequently if possible. The facility must provide EPA a copy of the site-specific LDAR monitoring plan at least 30 days before implementing it in lieu of the requirements of 40 CFR 63.453(k) and (l). The submitted plan must incorporate the approved conditions outlined in EPA's response. Except for inherently unsafe or inaccessible equipment, the facility will satisfy all other applicable monitoring requirements of 40 CFR 63.453(k) and (l).

Abstract for [Z180001]: [HYPERLINK "adi-neshap-z180001.pdf" \h]

Q: Does EPA conditionally approve Phillips 66 Company's request to modify a previously issued Alternative Monitoring Plan (AMP) for a Wet Gas Scrubber (WGS) on a the No. 4 Fluidized Catalytic Cracking Unit (FCCU) subject to NSPS part 60, subpart J, and also new requirements of NESHAP part 63, subpart UUU, for parametric monitoring of opacity at the WGS in lieu of a Continuous Opacity Monitoring System, due to moisture interference on opacity readings in the stack at its Ponca City Refinery, located in Ponca City, Oklahoma?

A: Yes. based upon the design of the WGS unit and EPA review of the test results and process specific supplemental information provided by Phillips 66 Company, EPA approves the

request for operating parameter limits (OPLs) for the WGS. The OPLs approved for demonstrating compliance with the AMP included minimum Liquid-to-Gas Ratio (L/G), minimum water pressure to the quench/spray tower nozzles, and minimum pressure drop across filter modules/cyclolabs.

Abstract for [Z180002]: [HYPERLINK "adi-neshap-z180002.pdf" \h]

Q: Does EPA conditionally approve Phillips 66 Company's request to modify a previously issued Alternative Monitoring Plan (AMP) for a Wet Gas Scrubber (WGS) on the No. 5 Fluidized Catalytic Cracking Unit (FCCU) subject to NSPS part 60, subpart J, and also new requirements of NESHAP Part 63, subpart UUU, for parametric monitoring of opacity at the WGS in lieu of a Continuous Opacity Monitoring System, due to moisture interference on opacity readings in the stack at its Ponca City Refinery located in Ponca City Oklahoma?

A: Yes. based upon the design of the WGS unit and EPA review of the test results and process specific supplemental information provided by Phillips 66 Company, EPA approves the request for operating parameter limits (OPLs) for the WGS. The OPLs approved for demonstrating compliance with the AMP included minimum Liquid-to-Gas Ratio (L/G), minimum water pressure to the quench/spray tower nozzles, and minimum pressure drop across filter modules/cyclolabs. The revised AMP must include data in support of retaining the independent OPLs established for the scrubber under NSPS subpart J, based on a performance test under worst case expected operating conditions, which will also meet the newly added opacity monitoring requirements under MACT subpart UUU.

Abstract for [1800006]: [HYPERLINK "adi-nsps-1800006.pdf" \h]

Q: For flares subject to NSPS subpart Ja and which are normally recovering flare gases, does EPA approve BP Products North America, Inc.'s (BP's) request to conduct an enhanced

cylinder gas audit (CGA) at its Whiting, Indiana refinery rather than a relative accuracy test audit (RATA) for the hydrogen sulfide (H2S) continuous emission monitoring systems (CEMS)?

A: No. EPA determines that BP can conduct the RATA due to the location of its H2S CEMS and has not demonstrated why foregoing the RATA in lieu of an enhanced CGA is necessary or more beneficial than other alternative monitoring options.

Abstract for [1800007]: [HYPERLINK "adi-nsps-1800007.pdf" \h]

Q: Does EPA approve a waiver of the requirement to conduct a Method 5 performance test under NSPS OOO and demonstration of compliance by other means for baghouses located at the Unimin Corporation facility in Troup, Texas?

A: Yes. EPA agreed that an alternate compliance demonstration based on any two-minute average of opacity from the baghouse stacks not exceeding five percent will provide adequate assurance of compliance with both the particulate concentration and opacity limits in subpart OOO. The Method 9 testing must be conducted in accordance with the applicable requirements of NSPS subparts A and OOO. Due to intermittent and short loading times that do not take place on a regular recurring schedule, Unimin is unable to perform an initial performance test using EPA Method 5. Completion of testing under Method 5 would require sources at the facility to operate much longer outside of normal operations, such that a large amount of product would be wasted without recovery. Additionally, scheduling testing to occur would be difficult due to the location and orientation of the baghouse stack outlets, and the intermittent nature of loading operations with little advance notice and very short durations, which are not sustained long enough to meet the sampling requirements of Method 5.

Abstract for [1800008]: [HYPERLINK "adi-nsps-1800008.pdf" \h]

Q1: Are tanks that meet the exemption levels of 40 CFR 60.110b(b) subject to any recordkeeping requirements in 40 CFR 60.116b, including 40 CFR 60.116b(b)?

A1: No. If a tank meets the exemption requirement under 40 CFR 60.110b(b) or (d), the requirements under 40 CFR 60.116b do not apply.

Q2: Is an existing Group I or II storage tank that is an affected source under NSPS subpart Kb, but which meets the exemption levels of 60.110b(b), required to comply with the recordkeeping requirement of NSPS subpart Kb?

A2: No. 40 CFR 63 .640(n)(1), states that if a Group 1 or Group 2 storage vessel under NESHAP subpart CC is part of an existing source, it is required to comply only with the requirements of NSPS subpart Kb. Therefore, if a Group 1 or Group 2 storage vessel can meet the exemption of subpart Kb, then the recordkeeping provisions of 40 CFR 60.116b do not apply.

Q3: What was the rationale for EPA's determination?

A3: NSPS subpart Kb defines affected facilities at 40 CFR 60.110b(a) and provides for an exemption at 40 CFR 60.110b(b) based on the size of the tank and the maximum true vapor pressure of the stored liquid. The exemptions at 40 CFR 60.110b(b) and (d) and begin with the phrase "This subpart does not apply to ..." Since NESHAP subpart CC references NSPS Kb for existing sources, the exemption in subpart Kb takes precedence.

Abstract for [1800009]: [HYPERLINK "adi-nsps-1800009.pdf" \h]

Q: Does EPA approve alternate span gas concentration values for hydrogen sulfide (H2S) on total reduced sulfur (TRS) continuous emissions monitoring systems (CEMS)for six flares at the HollyFrontier Navajo Refining Company's (HollyFrontier Navajo's) two petroleum refineries in Artesia and Lovington, New Mexico and covered under NSPS subparts A and Ja?

A: Yes. Based on the process data and analyzer information submitted, EPA conditionally approves the request with specified concentration ranges. HollyFrontier Navajo installed a ThermoFisher Scientific SOLA II pulsed ultraviolet fluorescence (PUVF) detector to continuously analyze and record the high span TRS concentrations at the flares. Holly Frontier

Navajo must conduct linearity analysis on the SOLA II PUVF detector once every three years to determine the detector's linearity across the entire range of expected concentrations of acid gas vent streams. The analysis shall demonstrate that linearity is maintained for all six flares for the vent gas stream H2S concentrations. A report of each completed linearity analysis shall be submitted to EPA Region 6 and to the New Mexico Environmental Department, and maintained in each facility's on-site records.

Abstract for [1700009]: [HYPERLINK "adi-nsps-1700009.pdf" \h]

Q: Does EPA determine that Monell CO2, LLC's (Monell) CO2 Flex Plant, located in Sweetwater County, Wyoming, that processes CO2 used in field stimulation is subject to NSPS OOOO provisions?

A: Yes. Per 40 CFR 60.5430, the definition of natural gas processing plant includes the extraction of natural gas liquids (NGLs). Because the Monell CO2 Flex Plant extracts NGLs, the EPA determines that the Monell CO2 Flex Plant is a natural gas processing plant subject to NSPS OOOO.

David A. Hindin,

Director, Office of Compliance

Office of Enforcement and Compliance Assurance

Dated:

Billing Code 6560-50-P